

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

CARL G. SIMPSON AND BONNIE REED
SIMPSON, CO-ADMINISTRATORS OF
THE ESTATE OF CARL D. SIMPSON,

Plaintiffs,

Hon. J. Dlott

vs.

Case No.: C-1-00014

INTERMET CORPORATION, ET AL.,

Defendants.

DEPOSITION OF ALAN GOULD

taken by the Plaintiff on the 21st day of July, 2003 at Best
Western, 510 Huron Avenue, Au Gres, Michigan at 1:34 p.m..

APPEARANCES:

For the Plaintiff:

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Interment and Ironton:

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For the Defendant
George Fischer Disa:

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1 A. I mean you'd use -- in the out position they -- the
2 machine would be running.

3 Q. Right.

4 A. When you wanted to lock the coping up, you'd have to
5 swing those in.

6 Q. Okay.

7 A. And as far as function goes, I guess they're both
8 being used to make sure this doesn't come down because of
9 gravity. But Intermet decided not to take this option
10 from us. They had another way they wanted to do it, and
11 maybe that's it. I don't know.

12 Q. The bars that we're talking about --

13 A. Yes.

14 Q. The drawing that you have in front of you that has
15 the swing arms, the arms that swing in. Are those
16 similar to a die block -- serve the same function I
17 guess?

18 A. I would say they serve the same function.

19 Q. Do you know how tall those arms or the blocks that
20 there -- are shown there on 41-1, and 2; how tall those
21 are? When I say tall, how -- I guess depends on if you
22 want to call it thickness or tallness. How thick they
23 were as far as when they swung in?

24 A. I'd say, you know, the thickness you're talking
25 about would be this dimension.